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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

REBECCA GOODSON,

Plaintiff,

vs.

QUICK COLLECT, INC.,

Defendant

Case No.:

COMPLAINT;

FAIR DEBT COLLECTION PRACTICES
ACT (15 USC 1692) ; INVASION OF
PRIVACY

DEMAND FOR JURY TRIAL

I. INTRODUCTION

1. This is an action for damages brought by an individual consumer for Defendant's violations of the following provisions, resulting from abusive behavior against Plaintiff in the course of Defendant's attempt to collect a debt the federal Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* (hereinafter "FDCPA").

II. JURISDICTION

2. The FDCPA claim arises under 15 U.S.C. § 1692k(d), and therefore involves a "federal question" pursuant to 28 USC § 1331. This court has supplemental jurisdiction over any Oregon State claims pursuant to 28 USC § 1367(a).

III. PARTIES

3. Plaintiff, Rebecca Goodson ("Plaintiff"), is a natural person residing in Multnomah County, Oregon.

4. Defendant, Quick Collect, Inc., ("Defendant") is a corporation engaged in the business of collecting debts by use of the mails and telephone, and Defendant regularly attempts to collect debts alleged to be due another.

IV. FACTUAL ALLEGATIONS

5. Defendant is a "debt collector" as defined by the FDCPA, 15 U.S.C. § 1692a(6).

6. Plaintiff is a "consumer" as defined by the FDCPA, 15 U.S.C. § 1692a(3).

7. All activities of Defendant set out herein were undertaken in connection with the collection of a "debt," as defined by 15 USC § 1692a(5).

8. Within the last year, Defendant took multiple actions in an attempt to collect a debt from Plaintiff. Included amongst these actions are the following, which amount to violations under various federal and state laws:

- a) Where new debts were suddenly added to the list of those collected by Defendant, failing to provide Plaintiff with the notices required by 15 USC § 1692g with regard to those new debts, either in the initial communication with Plaintiff, or in writing within 5 days thereof (§ 1692g(a));
- b) Using unfair or unconscionable means against Plaintiff in connection with an attempt to collect a debt, including adding new debts to Plaintiffs account with Defendant and refusing to provide information in writing regarding the origin of the debts (§ 1692f).

9. Defendant's actions, detailed in paragraph 8, was undertaken with extraordinary disregard of, or indifference to, known or highly probable risks to purported debtors.

10. Defendant's actions, detailed in paragraph 8, constituted an extraordinary transgression of the bounds of socially tolerable conduct

11. To the extent Defendant's actions, detailed in paragraph 8, were carried out by an employee of Defendant, that employee was acting within the scope of his or her employment.

COUNT I: VIOLATION OF FAIR DEBT COLLECTION PRACTICES ACT

12. Plaintiff reincorporates by reference all of the preceding paragraphs.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays that judgment be entered against the Defendant for the following:

- A. Declaratory judgment that Defendant's conduct violated the FDCPA
- B. Actual damages pursuant to 15 USC 1692k and the Common Law of Oregon;
- C. Statutory damages pursuant to 15 U.S.C. § 1692k and punitive damages pursuant the Common Law of Oregon.
- D. Punitive Damages
- E. Costs, disbursements and reasonable attorney's fees for all successful claims, and any unsuccessful claims arising out of the same transaction or occurrence as the successful claims, pursuant to 15 U.S.C. § 1692k and the Common Law of Oregon; and,
- F. For such other and further relief as may be just and proper.

PLAINTIFF HEREBY REQUESTS A TRIAL BY JURY

Dated this 24th day of August, 2009,

By: 

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